

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

JUDY JIEN, et al.,

Plaintiffs,

v.

PERDUE FARMS, INC., et al.,

Defendants.

C.A. No. 1:19-CV-2521-SAG

**JOINT STIPULATION AND
[PROPOSED] ORDER AMENDING
INTERIM SCHEDULING ORDER**

The Plaintiffs and Defendants in the above-captioned matter (collectively, the “Parties”), by and through their undersigned counsel and pursuant to Local Rule 105.9, on this 29th day of December 2021, recite and stipulate as follows:

WHEREAS, on December 10, 2021, the Court approved the Parties’ stipulation amending the Interim Scheduling Order in the above-captioned matter, *see* ECF Nos. 540, 541;

WHEREAS, on December 17, 2021, Plaintiffs filed a Motion for Leave to File a Third Amended Consolidated Complaint (“Motion to Amend”), a Motion for Leave to File Under Seal Plaintiffs’ Memorandum of Points and Authorities in Support of Their Motion for Leave to File Third Amended Consolidated Complaint (“Amended Complaint Sealing Motion”), a Motion for Preliminary Approval of Settlements with WMS and Peco (“Preliminary Approval Motion”), and a Motion for Leave to File Under Seal Plaintiffs’ Memorandum in Support of Motion for Preliminary Approval of Settlement with WMS and Peco Defendants (“Preliminary Approval Sealing Motion”), *see* ECF Nos. 544, 546-47, 549;

WHEREAS, Plaintiffs provided Defendants with specific proposed redactions to Plaintiffs’ memorandum in support of their Motion to Amend and the attached exhibits on December 23, 2021;

WHEREAS, Plaintiffs also provided Defendants with specific proposed redactions to the attached exhibits to the Preliminary Approval Motion on December 23, 2021;

WHEREAS, under the revised Interim Scheduling Order, Defendants will file any opposition to Plaintiffs’ Motion to Amend by January 10, 2022, and Plaintiffs will file any reply to any such opposition by January 28, 2022, *see* ECF Nos. 540, 541;

WHEREAS, the Parties previously agreed that Defendants would have until January 10, 2022 to file any opposition to the Amended Complaint Sealing Motion, and Plaintiffs would file any reply to any such opposition by January 28, 2022, *see* ECF No. 546-2;

WHEREAS, in the Preliminary Approval Sealing Motion, Plaintiffs proposed that Defendants would have until January 10, 2022 to file any opposition to the Preliminary Approval Sealing Motion, and Plaintiffs would file any reply to any such opposition by January 28, 2022, *see* ECF No. 549-2;

WHEREAS, the Parties have had productive dialogue on these issues;

WHEREAS, the Parties have agreed that the deadline for Defendants to file any oppositions to Plaintiffs' Motion to Amend, Amended Complaint Sealing Motion, and Preliminary Approval Sealing Motion should be extended from January 10, 2022 to January 24, 2022;

WHEREAS, the Parties have agreed that Defendants will file one consolidated brief opposing the Motion to Amend and a second consolidated brief opposing both the Amended Complaint Sealing Motion and the Preliminary Approval Sealing Motion;

WHEREAS, the Parties have agreed that the deadline for Plaintiffs to file any replies to any oppositions to the Motion to Amend, the Amended Complaint Sealing Motion, and the Preliminary Approval Sealing Motion should be extended from January 28, 2022 to February 18, 2022;

WHEREAS, the Parties have agreed that Plaintiffs will file one consolidated brief replying to any opposition to the Motion to Amend and a second consolidated brief replying to any opposition to the Amended Complaint Sealing Motion and the Preliminary Approval Sealing Motion;

THE PARTIES STIPULATE AND AGREE that (1) Defendants will file any opposition to Plaintiffs' Motion to Amend, Amended Complaint Sealing Motion, and Preliminary Approval Sealing Motion no later than January 24, 2022; (2) Defendants will file one consolidated brief opposing Plaintiffs' Motion to Amend and a second consolidated brief opposing both the Amended Complaint Sealing Motion and the Preliminary Approval Sealing Motion; (3) Plaintiffs will file any replies to those oppositions no later than February 18, 2022; and (4) Plaintiffs will file one consolidated brief replying to any opposition to the Motion to Amend and a second consolidated brief replying to any opposition to the Amended Complaint Sealing Motion and the Preliminary Approval Sealing Motion.

Dated: December 29, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice to counsel for all parties that have appeared in this case.

/s/ Brent W. Johnson _____

IT IS SO ORDERED.

DATED: _____

United States District Judge Stephanie A. Gallagher